1 2 3 4 5	John D. Tennert, III (SBN 11728) Wade Beavers (SBN 13451) FENNEMORE CRAIG, P.C. 7800 Rancharrah Parkway Reno, Nevada 89511 Tel: (775) 788-2212   Fax: (775) 786-1177 jtennnert@fennemorelaw.com wbeavers@fennemorelaw.com		
6	Douglas C. Northup ( <i>Pro Hac Vice</i> )		
7	FENNEMORE CRAIG, P.C. 2394 E. Camelback Road, Suite 600		
8	Phoenix, Arizona 85016		
9	Tel: (602) 916-5362   Fax: (602) 916-5562 dnorthup@fennemorelaw.com		
10	Attorneys for Defendants		
11			
12	LIMITED STATES DISTRICT COURT		
13	UNITED STATES DISTRICT COURT		
14	DISTRICT OF NEVADA		
15	YURIDIA CHAVEZ-HERRERA,	Case No. 2:19-cv-01327-GMN-BNW	
16	Plaintiff,		
17	VS.	STIPULATION AND ORDER TO EXTEND	
18	SHAMROCK FOODS COMPANY, an	DEADLINE FOR DEFENDANTS TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND	
19	Arizona foreign corporation; JOSE PAZ; DOES II through X; and ROE	COMPLAINT (ECF 146)	
20	CORPORATIONS I through X, inclusive,	(FIRST REQUEST)	
21	Defendants.		
22	Plaintiff Yuridia Chavez-Herrera and Defendants Shamrock Foods Company and Jose Paz,		
23	by and through undersigned counsel, hereby stipulate and agree that Defendants Shamrock Foods		
24	Company and Jose Paz shall have a two-week extension, until February 2, 2024, to file their		
25	Opposition to Plaintiff's Motion for Leave to Amend Complaint (ECF 146). Pursuant to LR IA 6-1,		
26	this is the first request to extend the deadline to file an opposition to Plaintiff's Motion. The extension		
27	is requested due to defense counsel having several other motions due in other cases over the next		
28 <b>FENNEMORE.</b>	several weeks. The request is not sought for the purposes of delay and will not result in prejudice to		

7800 Rancharrah Parkway Reno, NV 89511 775-788-2200

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1	the parties or the Court. No hearing on Plainti	iff's Motion has been set.
2	Dated: January 8, 2024.	Dated: January 8, 204.
3	FENNEMORE CRAIG, P.C.	CLAGGETT & SYKES LAW FIRM
4	By: /s/ Douglas C. Northup	By: /s/ Brian Blankenship (w/consent)
5	Douglas C. Northup ( <i>pro hac vice</i> ) 2394 E. Camelback Rd., Suite 600	Sean K. Claggett, Esq. (SBN 8407) Brian Blankenship, Esq. (SBN 11522)
6	Phoenix, Arizona 85016	Scott E. Lundy, Esq. (SBN 14235)
7	-and-	Vanessa M. Turley, Esq. (SBN 14635) 4101 Meadows Lane, Suite 100
8		Las Vegas, Nevada 89107
9	John D. Tennert, III Esq. (SBN 11728) Wade Beavers, Esq. (SBN 13451) 7800 Rancharrah Parkway	-and-
10	Reno, Nevada 89511	Benjamin J. Bingham, Esq. (SBN 7280)
11	Attorneys for Defendants	Ida M. Ybarra, Esq. (SBN 11327) <b>BENSON &amp; BINGHAM</b>
12	11.00 mays you 2 ayonuums	11441 Allerton Park Drive, Suite 100
13		Las Vegas, Nevada 89135
14		Attorneys for Plaintiff
15		
16		
17		IT IS SO ORDERED:
18		II IS SO ORDERED.
		Da Jawekala
19		UNITED STATES MAGISTRATE JUDGE
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21		Dated: 1/9/2024
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1	CERTIFICATE OF SERVICE		
2	Pursuant to FRCP 5(b), I hereby certify that I am an employee of Fennemore Craig, P.C., and		
3	that on this date, I served, or caused to be served, a true and correct copy of the foregoing document		
4	via electronic filing through the Court's CM/ECF system to the attorneys associated with this case:		
5	Benjamin J. Bingham, Esq. Sean K. Claggett, Esq.		
6	Ida M. Ybarra, Esq.Brian Blankenship, Esq.BENSON & BINGHAMScott E. Lundy, Esq.		
7	11441 Allerton Park Drive, Suite 100 Vanessa M. Turley Las Vegas, Nevada 89135 CLAGGETT & SYKES LAW FIRM		
8	4101 Meadows Lane, Suite 100		
9	Las Vegas, Nevada 89107		
10	Attorneys for Plaintiff Attorneys for Plaintiff		
11	Dated: January 8, 2024.		
12	/s/ Phyllis Warren Employee of Fennemore Craig, P.C.		
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